



# Sierra Pacific Industries

Lincoln Division • Lincoln, CA 95648 • 1440 Lincoln Blvd. • (916) 645-1631

September 7, 2016

Randall Gould  
District Ranger  
875 Mitchell Avenue  
Oroville, CA 95965

RE: Challenge Community Protection and Fuels Reduction (CPFR) Project

Dear Randall,

I am writing on behalf of Sierra Pacific Industries – Lincoln Division regarding the proposed Challenge CPFR Project Environmental Assessment. Sierra Pacific Industries (SPI) operates forest products manufacturing facilities in Oroville, Lincoln, Quincy, and Anderson. These sawmills are an important part of the local economy and provide family wage jobs for their employees. The forest products that are developed from projects like this one from the National Forests lands contribute a significant amount to our raw material needs and the public's need in general for wood products.

The Project Needs and Purposes are identified as follows:

1. Remove hazard trees along roadways to make these areas safer and increase roadside viewing distances.
2. Thin vegetation to create defensible space along roads and ridgetops to create safe conditions for wildland firefighters; thinning would be more aggressive near roads and taper off at a greater distance from the roads.
3. Reduce ground, ladder, and crown fuels by thinning trees and brush.
4. Increase the resilience to draught induced tree mortality and insector disease infestation.
5. Utilize removed material – timber and smaller trees – to create an economic benefit locally and generate partial funding for other service fuel reduction treatments.
6. Remove invasive plants from the project area.

Please consider the following comments:

SPI supports the Forest Service's purpose and need for action within the Challenge Project area. We are very familiar with the area. The project will expand on treatments already done on private land completed by the Fire Safe Councils and other private land owners. The project is strategically important to Challenge and the adjoining communities and is in the wildland-urban interface.

We would like to see Socio Economic Benefits associated with the Challenge Project included in the analysis. Project Needs 5 mentions an “economic benefit locally” but there is really no mention of the Economic Benefits of the project in general. There should be a Project Need developed in the EA that is specific to the supply of forest products for local forest industries and the associated benefits to local communities. Example: “There is a need to provide raw materials to local forest industries to provide sustainability to the remaining forest products infrastructure”. The local logging, road building, and sawmill infrastructure that is currently in place is essential to the success and implementation of projects like this as well as the wellbeing of rural communities in which they operate.

According to the Specific Treatments table (page 4) proposed within the project area, less than 10% of the acres have been identified for mechanical thinning (timber removal). Mechanical thinning in conjunction with other fuels treatments is a cost effective method to improve forest health and stand resiliency. It should be used on as many acres as possible. The current ongoing drought mortality occurring in the forest illustrates there are too many trees per acre in general and not too few.

Tree size should not determine thinning treatments. Priority should be placed on tree vigor and reducing stand density.

Economic viability of the project as it relates to the selection of various fuels treatments should be analyzed as well.

It appears biomass removal is going to be analyzed. As you know there are currently no viable biomass markets within reasonably close proximity to the project.

Thank you for considering our comments. We look forward to future opportunities to participate in the Challenge Project as it moves forward.

Sincerely,



Ken Wilde  
Sierra Pacific Industries  
Lincoln Division